

### C. Remarks

The claims are 1-8, with claim 1 being the sole independent claims. Claim 1 has been amended to further define the invention; specifically, claim 1 has been amended to further describe the electrostatic protective element as comprising (a) a pull-down resistor or a pull-up resistor, either of which having a parasitic diode for electrostatic protection between ground lines; (b) a diode for electrostatic protection connected to a ground line; (c) at least two diodes for electrostatic protection connected to a logic circuit drive power supply; and (d) a polysilicon resistor. This amendment is supported in the specification and in each of Figures 6 and 7; accordingly, no new matter has been added. Reconsideration of this application is respectfully requested.

Claims 1, 2 and 6-8 stand rejected under 35 U.S.C. §103(a) as being anticipated by Imanaka (U.S. Patent No. 6,243,111) in view of Hawkins (U.S. Patent No. 5,532,901). Claims 3-5 stand rejected under 35 U.S.C. §103(a) as being obvious over Imanaka in view of Hawkins and further in view of Ghozeil (U.S. Patent No. 6,375,295). Applicants respectfully traverse those rejections.

First, Applicants note that all previous arguments delineating the differences between the presently claimed invention and the cited Imanaka reference are incorporated by reference herein; Imanaka's CR integration circuit is clearly different from the logic circuit of the present invention. Second, Applicants would like to address Imanaka's continued deficiency in its failure to disclose or suggest the electrostatic protective element as now claimed in claim 1. Specifically, claim 1 now specifically claims the electrostatic protective element of Figures 6 and 7, that is, an electrostatic protective element comprising (a) a pull-down resistor or a pull-up resistor, either of which having a parasitic

diode for electrostatic protection between ground lines; (b) a diode for electrostatic protection connected to a ground line; (c) at least two diodes for electrostatic protection connected to a logic circuit drive power supply; and (d) a polysilicon resistor. Imanaka does not disclose or suggest the provision of any electrostatic protective element for the input line, let alone does Imanaka disclose or suggest the specific electrostatic protective element presently claimed.

Hawkins does not remedy the deficiencies of Imanaka. While Hawkins does disclose a type of device for electrostatic discharge protection, Hawkins does not disclose or suggest the presently claimed electrostatic protective element comprising (a) a pull-down resistor or a pull-up resistor, either of which having a parasitic diode for electrostatic protection between ground lines; (b) a diode for electrostatic protection connected to a ground line; (c) at least two diodes for electrostatic protection connected to a logic circuit drive power supply; and (d) a polysilicon resistor. Accordingly, no combination of Imanaka and Hawkins renders the present invention obvious.

Ghozeil does not remedy the deficiencies of Imanaka. In fact, Ghozeil is cited for its disclosure related to CMOS inverters of even number stages arranged serially. Ghozeil, not unlike Imanaka and Hawkins, does not disclose or suggest the specific electrostatic protective element as set forth in claim 1. Accordingly, no combination of Imanaka, Hawkins and Ghozeil renders the present invention obvious.

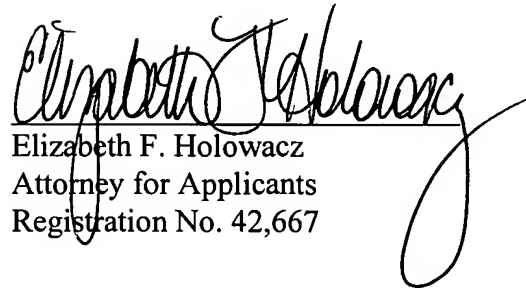
It is clear that none of the cited references, whether considered alone or in combination, renders obvious the present invention. There is simply no teaching of a key feature of the present invention, namely the provision of an electrostatic protective element

comprising elements (a) through (d) noted above. Accordingly, Applicants respectfully request withdrawal of the prior art rejections.

In view of the foregoing amendments and remarks, favorable reconsideration and passage to issue of this case is respectfully requested. Should the Examiner believe that issues remain outstanding, the Examiner is respectfully requested to contact Applicants' undersigned attorney in an effort to resolve such issues and advance the case to issue.

Applicants' undersigned attorney may be reached in our New York office by telephone at (212) 218-2100. All correspondence should continue to be directed to our below listed address.

Respectfully submitted,



Elizabeth F. Holowacz  
Attorney for Applicants  
Registration No. 42,667

FITZPATRICK, CELLA, HARPER & SCINTO  
30 Rockefeller Plaza  
New York, New York 10112-3801  
Facsimile: (212) 218-2200

NY\_MAIN 539918v1